

# **EXHIBIT B**

Videotaped Deposition of  
**Tracy Wolff**  
March 07, 2023

Freeman

vs.

Deeks

**Confidential**



Confidential

Freeman vs.  
Deebs

Tracy Wolff

1 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2 LYNNE FREEMAN, )  
3 AN INDIVIDUAL )  
4 PLAINTIFF, )  
5 VS. )  
6 TRACY DEEBS-ELKENANEY )  
7 P/K/A TRACY WOLFF, AN )  
INDIVIDUAL, EMILY SYLVAN )  
8 KIM, AN INDIVIDUAL, )  
PROSPECT AGENCY, LLC, A )  
NEW JERSEY LIMITED ) CASE NO. 1:22-CV-02435-LLS  
LIABILITY COMPANY, )  
9 ENTANGLED PUBLISHING, )  
LLC, A DELAWARE LIMITED )  
10 LIABILITY COMPANY, )  
HOLTZBRINCK PUBLISHERS, )  
11 LLC D/B/A MACMILLAN, )  
A NEW YORK LIMITED )  
12 LIABILITY COMPANY, AND )  
UNIVERSAL CITY STUDIOS, ) JOB NO. 10115799  
13 LLC, A DELAWARE )  
LIMITED LIABILITY COMPANY )  
14 DEFENDANTS. )

15 \*\*\*\*\*

16 ORAL AND VIDEOTAPED DEPOSITION OF  
17 TRACY WOLFF  
MARCH 07, 2023

18 \*\*\*\*\*

19

20 ORAL AND VIDEOTAPED DEPOSITION of TRACY WOLFF,  
21 produced as a witness at the instance of the Plaintiff,  
and duly sworn, was taken in the above-styled and  
22 numbered cause on the 7th day of March, 2023, from 8:54  
a.m. to 4:34 p.m., before Gabriela S. Silva, CSR, RPR in  
23 and for the State of Texas, reported by stenograph, at  
the Law Offices of Kowert, Hood, Munyon, Rankin &  
Goetzl, 1120 S. Capital of Texas Hwy, Building 2,  
24 Austin, Texas, pursuant to the Federal Rules of Civil  
Procedure and the provisions stated on the record or  
25 attached hereto.

Confidential

Freeman vs.  
Deebs

Tracy Wolff

A P P E A R A N C E S

COUNSEL FOR THE PLAINTIFF:

MARK D. PASSIN  
CSREEDER, PC  
11766 Wilshire Blvd., Ste. 1470  
Los Angeles, California 90025  
(310) 861-2470  
Mark@csrlawyers.com

COUNSEL FOR THE DEFENDANTS:

DWAYNE GOETZEL  
KOWERT, HOOD, MUNYON, RANKIN & GOETZEL  
1120 S. Capital of Texas Hwy, Building 2  
Austin, Texas 78746  
(512) 853-8800  
Dgoetzel@intprop.com

NANCY E. WOLFF  
CECE COLE  
COWAN, DEBAETS, ABRAHAMS & SHEPPARD, LLP  
41 Madison Avenue, 38th Floor  
New York, New York 10010  
(212) 974-7474  
Nwolff@cdas.com

ALSO PRESENT:

Mr. Walter Bryan, Videographer  
Mr. Trent Baer, Plaintiff's Husband  
Mr. Lance Koonce (via Zoom)  
Mr. Zachary Press (via Zoom)  
Mr. Stephen Doniger (via Zoom)  
Mrs. Lynne Freeman (via Zoom)

Confidential

Freeman vs.  
Deebs

Tracy Wolff

1 started any. Liz Pelletier, I believe, started one or  
2 two.

3 Q. Are you aware, was there an access log to the  
4 Google Docs?

5 A. I don't know what an access log is.

6 Q. Well, access log would be a listing that shows  
7 who had accessed the Google Docs at any time. Did you  
8 ever see anything like that?

9 A. No.

10 Q. And maybe because you're not the owner?

11 A. Yeah, I -- I don't know.

12 Q. Did you use any text spinning software to write  
13 any of the books in the Crave book series?

14 A. I'm sorry. I don't understand the question.

15 Q. Are you familiar with text spinning software?

16 A. I have no idea what that is.

17 Q. Well, did you use any other kind of software --  
18 did you use any kind of software to write or edit the  
19 books in the Crave book series other than what we've  
20 already discussed?

21 A. I used Microsoft Word.

22 Q. Did you use any artificial intelligent bots that  
23 are able to reword sentences in writing any of the books  
24 in the Crave book series?

25 A. I did not.

Confidential

Freeman vs.  
Deebs

Tracy Wolff

1 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2 LYNNE FREEMAN, )  
3 AN INDIVIDUAL )  
4 PLAINTIFF, )  
5 VS. )  
6 TRACY DEEBS-ELKENANEY )  
7 P/K/A TRACY WOLFF, AN )  
8 INDIVIDUAL, EMILY SYLVAN )  
9 KIM, AN INDIVIDUAL, )  
10 PROSPECT AGENCY, LLC, A )  
11 NEW JERSEY LIMITED ) CASE NO. 1:22-CV-02435-LLS  
12 LIABILITY COMPANY, )  
13 ENTANGLED PUBLISHING, )  
14 LLC, A DELAWARE LIMITED )  
15 LIABILITY COMPANY, )  
16 HOLTZBRINCK PUBLISHERS, )  
17 LLC D/B/A MACMILLAN, )  
18 A NEW YORK LIMITED )  
19 LIABILITY COMPANY, AND )  
20 UNIVERSAL CITY STUDIOS, )  
21 LLC, A DELAWARE )  
22 LIMITED LIABILITY COMPANY )  
23 DEFENDANTS. )

15 REPORTER'S CERTIFICATION  
16 DEPOSITION OF TRACY WOLFF  
17 March 07, 2023

18 I, Gabriela S. Silva, Certified Shorthand  
19 Reporter in and for the State of Texas, hereby certify  
20 to the following:

21 That the witness, TRACY WOLFF, was duly sworn by  
22 the officer and that the transcript of the oral  
23 deposition is a true record of the testimony given by  
24 the witness;

25 I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

\_\_\_X\_\_\_ was requested by the deponent or a party before  
the completion of the deposition and that the signature  
is to be before any notary public and returned within  
30 days from date of receipt of the transcript. If  
returned, the attached Changes and Signature Page  
contains any changes and the reasons therefor;

Confidential

Freeman vs.  
Deebs

Tracy Wolff

1        \_\_\_\_\_ was not requested by the deponent or a party  
2        before the completion of the deposition.

3                I further certify that I am neither counsel for,  
4        related to, nor employed by any of the parties or  
5        attorney in the action in which this proceeding was  
6        taken, and further that I am not financially or  
7        otherwise interested in the outcome of the action.

8                Certified to by me this 13th day of  
9        March, 2023.



10                Gabriela S. Silva, Texas CSR(8706), RPR  
11                Expiration Date: 01-31-25  
12                Aptus Court Reporting  
13                600 West Broadway, Suite 300  
14                San Diego , CA 92101  
15                Phone: 866.999.8310

16  
17  
18  
19  
20  
21  
22  
23  
24  
25